

**IN THE UNITED STATES DISTRICT COURT
FORTH THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CAROLS MUNOZ; and ALICIA PEREZ,)	
Individually and as Mother and Next Friend of)	
ALAIA MUNOZ, a Minor,)	
)	
Plaintiff,)	
vs.)	No.: 20-cv-2344
)	
JOVON SANDERS, Individually and as Servant)	
and Agent of TIRE WHOLESALERS)	Circuit Court of Cook
COMPANY, and TIRE WHOLESALERS)	County, Illinois
COMPANY,)	Case No. 2020 L 002810
)	
Defendants.)	

NOTICE OF REMOVAL

Defendants JOVON SANDERS, individually and as Servant and Agent of Tire Wholesalers Company and TIRE WHOLESALERS COMPANY, by and through their attorneys Foley & Mansfield, PLLP, hereby respectfully submit this Notice of Removal of this action from the Circuit Court of Cook County, Illinois to the United States District Court for the Northern District of Illinois. In support of this Notice of Removal, Defendants state as follows:

1. This action was commenced against Jovon Sanders, Individually and as Servant and Agent of Tire Wholesalers Company and against Tire Wholesalers Company in the Circuit Court of Cook County, Illinois, on March 9, 2020. A copy of the complaint was mailed to Jovon Sanders on March 16, 2020. Neither defendant has been properly served with a copy of the complaint and defendants do not by filing this Notice of Removal waive any objections or defenses they may have to improper service of process.

This notice is filed within 30 days after the complaint was mailed to defendant Jovon Sanders.

2. At the time the action was commenced and since then, the Plaintiffs were and are citizens of the County of Cook, State of Illinois. Defendant Jovon Sanders was and is a citizen of the County of Lake, State of Indiana. Tire Wholesalers Company was and is a corporation organized and existing under the laws of the State of Michigan with its principal place of business in Troy, Michigan.

3. The amount in controversy exceeds \$75,000, exclusive of interest and costs, as appears from the Plaintiffs' complaint, a copy of which is attached hereto as Exhibit A. A copy of the Summons mailed to Jovon Sanders is attached hereto as Exhibit B. This action is a civil one in which the United States District Courts have original jurisdiction under 28 U.S.C. §1332.

4. The defendant attaches to this notice copies of all process, pleadings, and orders that have been served on it.

WHEREFORE, Defendants JOVON SANDERS, individually and as Servant and Agent of Tire Wholesalers Company and TIRE WHOLESALERS COMPANY pray that this cause be removed to the United States District Court for the Northern District of Illinois.

Respectfully Submitted,

**JOVON SANDERS, INDIVIDUALLY
AND AS AGENT OF TIRE
WHOLESALERS COMPANY, AND
TIRE WHOLESALERS COMPANY,**

/s/Stephen R. Vedova

One of their Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all registered attorneys of record. I further certify that I will cause a copy of the foregoing document to be served upon the following counsel of record, postage prepaid, on the 16th day of April, 2020:

Lindsey A. Seeskin
The Horwitz Law Group
20 N. Clark Street, Suite 3300
Chicago, IL 60602
(312) 641-9200

/s/ Stephen R. Vedova